


Inspire Partnership Academy Trust
Woodhill Primary School
Legionella Management Policy

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1. Statement of Intent

1.1 Introduction

- 1.1.1 This policy applies to all relevant school activities and is written in compliance with all current UK health and safety legislation.
- 1.1.2 The school is committed to providing a working environment which is safe and without risks to the health, safety and welfare of its employees, students, contractors, and visitors. To achieve this, the school will ensure:
 - 1.1.2.1 The risks from the proliferation of legionella bacteria that may exist in our water systems are **identified, controlled, and managed**, in accordance with the HSE document L8, to ensure that staff, students, visitors, or passers-by are protected from the risks.
 - 1.1.2.2 The requirements of the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and HSE document L8 are complied with.
 - 1.1.2.3 Appropriately trained, technically competent and experienced staff are available and resourced to adequately manage water systems and associated legionella control.
 - 1.1.2.4 Appropriate risk assessments and safe working practices are **identified** and followed by all contractors and sub-contractors.

1.2 Review procedures

- 1.2.1 This policy will be reviewed regularly and revised as necessary. Any amendments to named persons will be updated at school level as-and-when required with any substantive amendments presented to the CEO for acceptance, or in any case at least every three years.

1.3 Distribution of copies

- 1.3.1 Copies of the approved policy will be shared to relevant staff and displayed on the school website.

2. Roles and Responsibilities

2.1 Introduction

- 2.1.1 The Duty Holder is responsible for ensuring that all control measures **identified** in the legionella risk assessment are in place and that further improvement actions are completed so far as is reasonably practicable.
- 2.1.2 The Duty Holder will assign an appropriate member of their team the responsibility to complete each improvement action and implement a control regime (the Responsible Person).

- 2.1.3 The Responsible Person will ensure that a written scheme is produced and implemented, where a reasonably foreseeable risk of exposure exists, for preventing or controlling the risks.
- 2.1.4 The Responsible Person will ensure that regular cleaning, treating, maintaining, and operating of water systems at predetermined intervals is carried out.
- 2.1.5 The Responsible Person will ensure that regular monitoring, inspecting, testing, e.g. water temperatures and legionella bacteria levels testing, reviewing of the water system's control measures, risk assessments and the written scheme to ensure that management procedures are working **effectively**.
- 2.1.6 The following are the **defined** responsibilities for those working within the school who have been assigned specific **duties**:
 - 2.1.6.1 The Duty Holder (the Trustees)
 - 2.1.6.2 The Responsible Person (the Headteacher)
 - 2.1.6.3 The Competent Person (Trust Premises Team)
 - 2.1.6.4 The Delegated Person (the Site Supervisor)
 - 2.1.6.5 All staff

2.2 The Trustees (the Duty Holder)

- 2.2.1 As the employer the Trustees have overall responsibility for health and safety matters at the school and therefore by default acts as the 'Duty Holder' for legionella management.
- 2.2.2 Responsibility for undertaking aspects of these duties listed below are delegated through the school and Trust management structures as follows:
 - 2.2.2.1 Ensuring that a suitable and **sufficient** risk assessment is carried out to identify and assess the risk of exposure to legionella bacteria from work activities and water systems under their remit.
 - 2.2.2.2 Ensuring that a written scheme is produced and implemented, where a reasonably foreseeable risk of exposure exists, for preventing or controlling those risks.
 - 2.2.2.3 Making sure that a Responsible Person (Headteacher) is appointed to help the Duty Holder (the Trustees), manage the day-to-day operational control procedures in accordance with the written scheme of control. If the school is without a Responsible Person, all responsibility falls to an identified **Deputy Responsible Person**.
 - 2.2.2.4 Ensuring that steps are taken to check that equipment supplied for water systems are designed to minimise the growth of legionella bacteria and are installed in compliance with relevant water related regulations.
 - 2.2.2.5 Ensuring that persons working with water systems are appropriately supervised and have been provided with suitable information, instruction and training including the **significant findings of risk** assessments.

- 2.2.2.6 Ensuring that the risk of legionella is eliminated, where reasonably practicable, through improved engineering design of water systems e.g. by removing dead-legs or removing unused showers where water can stagnate.
- 2.2.2.7 Ensuring that regular cleaning, treating, maintaining, and operating of water systems at predetermined intervals.
- 2.2.2.8 Ensuring that regular monitoring, inspecting, testing, e.g. water temperatures and legionella bacteria levels testing, and reviewing of the water systems control measures, risk assessments and the written scheme to ensure that management procedures are working **effectively**.
- 2.2.2.9 Ensuring that the risks from scalding are minimised.
- 2.2.2.10 Where relevant, ensuring that the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) are complied with.

2.3 Headteacher (the Responsible Person)

- 2.3.1 As the 'Responsible Person' the Headteacher is empowered to ensure that legislative requirements are met; and that testing, maintenance or repairs are initiated as required. Such powers are supported by the necessary, **sufficient** and appropriate resources, including funds.
- 2.3.2 The Headteacher is responsible for ensuring:
 - 2.3.2.1 The school implements **effectively** the legionella management policy.
 - 2.3.2.2 They consult with the Trust Premises Team or their appointed 'Competent Person' where necessary or to advise of any changes which may be needed.
 - 2.3.2.3 To support and facilitate the development of, and to implement the tasks identified **within a written scheme of control for legionella** management.
 - 2.3.2.4 That a legionella risk assessment is completed every three years and is reviewed annually by a competent person.
 - 2.3.2.5 That a 'Delegated Person' is appointed to undertake the routine tasks highlighted in the legionella risk assessment and the requirements of the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and HSE document L8.
 - 2.3.2.6 Relevant **staff** are **notified** of the **significant findings** of the legionella risk assessment.
 - 2.3.2.7 Recommended actions and remedial works derived from the legionella risk assessment are completed as appropriate.
 - 2.3.2.8 The maintenance/testing of all water management systems and equipment are completed and recorded on the relevant system.
 - 2.3.2.9 They undertake any relevant training necessary to carry out the role of Responsible Person.

- 2.3.2.10 The provision of appropriate legionella awareness & management training to the relevant staff.
- 2.3.2.11 In instances where contractors create hazardous conditions and refuse to eliminate them or take action to make them safe, they will take such actions as are necessary to protect the safety of school staff, **students and visitors**.
- 2.3.2.12 That a 'Deputy Responsible Person' is **identified and will take on the** responsibilities of the Headteacher in their absence. This will normally be the Deputy or Assistant Headteacher.
- 2.3.2.13 To advise the Trust Premises Team of any changes to the **staffing** structure which **affect** these responsibilities or the written scheme of control.
- 2.3.2.14 To make any report or submission necessary under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) where relevant.

2.4 Trust Premises Team (the Competent Person)

- 2.4.1 Acting as or appointing a 'Competent Person' the Trust Premises Team are responsible for supporting and advising the Responsible Person and the Delegated Person to carry out their obligations and responsibilities **effectively**, and to coordinate the approach across the Trust estate and premises.
- 2.4.2 The Trust Premises Team will provide support by:
 - 2.4.3 Ensuring the legionella management policy is clearly communicated to all Responsible and Delegated Persons.
 - 2.4.4 Ensuring the legionella management policy is reviewed and updated as necessary.
 - 2.4.5 Leading on the risk programme for the prevention of legionella bacteria in the school water and associated systems and, with the assistance of a Competent Person, carry out a risk assessment with or for the school.
 - 2.4.6 Leading on the development of a written scheme of control of legionella and to seek and implement advice on prevention and control procedures.
 - 2.4.7 Regular monitoring and checking of water system procedures and practices.
 - 2.4.8 Ensuring that an appropriate training program is available for the Headteacher to implement at the school.
 - 2.4.9 The monitoring of records of checks of work and maintenance completed by the school to ensure it in accordance with the risk assessment and written scheme of control.
 - 2.4.10 Supporting the schools to identify and undertake any work or actions or inspections.
 - 2.4.11 To support and review processes across the Trust and to assess for **effectiveness**.

- 2.4.12 To support the appropriate selection and appointment of competent persons and contractors for schools to take advice and remedial works from.

2.5 Site Supervisor (the Delegated Person)

- 2.5.1 As the lead role undertaking day-to-day and routine maintenance within the school the Site Supervisor (or other lead site-based member of the Premises team as identified by the Responsible Person) shall be the 'Delegated Person' acting on behalf and under instruction of the Responsible Person to ensure their work and records are completed as required to keep the school water and associated systems safe and compliant.
- 2.5.2 The Delegated Person is responsible for:
- 2.5.2.1 The implementation of the routine tasks identified in the legionella risk assessment and the written scheme of control.
 - 2.5.2.2 The day-to-day management of water systems, plant, and equipment and for legionella reduction.
 - 2.5.2.3 The coordination, inspection and monitoring of the water system at the advised frequencies or more often if the need arises.
 - 2.5.2.4 Ensuring that all water system maintenance and alterations comply with HSE document L8 and other appropriate legislation.
 - 2.5.2.5 Ensuring that all water system maintenance and alterations comply with this policy and any associated procedures.
 - 2.5.2.6 Seeking advice where they are unsure of their requirements and obligations or have concerns relating to the safety of water and legionella management and control.
 - 2.5.2.7 Reporting to the Responsible Person immediately of any significant breaches which need to be urgently rectified safely.
 - 2.5.2.8 Proactively resolving minor water system or legionella issues if advised or competent to do so.
 - 2.5.2.9 Ensuring that appropriate records and systems are maintained and updated promptly, including any digital facilities management systems (Parago) and at all times including for in-house and contractor checks, and that these are in line with the legionella risk assessment requirements.
 - 2.5.2.10 Reporting any resourcing issues to the Responsible Person and Trust Premises Team which are required so that legal compliance can be maintained and evidenced.
 - 2.5.2.11 To proactively support and facilitate the Trust Premises Team in their works relating to water safety and legionella management.
 - 2.5.2.12 To act as the Deputy Responsible Person where necessary.

2.6 All staff

- 2.6.1 All staff in all schools and Trust roles have responsibility for health and safety and to promote good practices and to challenge appropriately where that may not be the case.
- 2.6.2 In respect of water safety and legionella management all staff are responsible for:
- 2.6.3 Following any information or instruction, including in this legionella management policy, from the Duty Holder, Responsible Person or Delegated Person as may be needed for them to discharge their obligations **effectively**.
- 2.6.4 Undertaking any relevant training as may be identified by the Responsible Person.
- 2.6.5 Proactively engaging with management arrangements for the control of legionella.
- 2.6.6 Reporting promptly to the Responsible Person any disease diagnosed as Legionnaires Disease.
- 2.6.7 Reporting immediately to the Responsible Person any hazardous or dangerous situations.

3. Arrangements

3.1 Legionella description

- 3.1.1 Legionellosis is a collective term for those diseases caused by legionella bacteria, including the most serious, Legionnaires Disease as well as the less serious Pontiac fever and Lochgoilhead fever
- 3.1.2 Legionellosis can **affect** anyone who inhales small droplets of water (aerosols) from water systems, e.g. showers that are contaminated with legionella bacteria, however, principally **affecting** those who are susceptible due to age, illness, immune-suppression, smoking etc. and may be fatal.
- 3.1.3 Legionella is widespread in natural sources of water.

3.2 Risk Factors of legionella

- 3.2.1 The presence of legionella bacteria is common at low levels, however, the conditions that encourage legionella bacteria to multiply to more dangerous levels include poorly maintained systems, **ineffective control** measures, presence of **biofilm, rust, sludge or scale etc. and particularly in water** temperatures of between 20 – 45 degrees C.
- 3.2.2 The means of creating and disseminating breathable aerosols, e.g. from spas, showers, taps, **fire** sprinkler systems, water jets, hose pipes, fountains and hot water systems etc.

- 3.2.3 The disease / fever can **affect** anyone; however, some people are at higher risk than others e.g. those people over 50, smokers, heavy drinkers, diabetics, those with respiratory problems and immune system impairments.

3.3 Training requirements

- 3.3.1 In order for appointed persons to fulfil their responsibilities set out in this policy **effectively** appropriate training must be **offered** by the school and undertaken by the relevant persons.
- 3.3.2 All relevant persons must undergo periodic refresher training in order to maintain awareness and knowledge required to fulfil their responsibilities set out in this policy.

3.4 Operation and maintenance

- 3.4.1 To prevent the growth of legionella bacteria the water systems shall operate at the following temperatures.
- 3.4.2 Cold water distribution and storage at 20 °C or below.
- 3.4.3 Hot water distribution at least 50 °C.
- 3.4.4 Hot water storage, (**calorifiers**), at 60 °C.
- 3.4.5 Where there is a risk of scalding from taps at 50 °C e.g. to children or elderly, the use of thermostatically control mixing valves (TMVs) should be used to allow water systems to run safely at higher temperatures.
- 3.4.6 It may be required from time-to-time to increase water temperatures to treat or reduce the risk of legionella bacteria found or suspected in water systems. In these cases local arrangements will be introduced to minimise the risk of scalding.

4. Conclusion

- 4.1.1 **Effective** management of water systems at the school is recognised as critical in the prevention of ill health from legionella bacteria.
- 4.1.2 Regular maintenance and monitoring of water systems at the school will ensure that the risks of legionella bacteria are suitably controlled.
- 4.1.3 The services of competent persons will be contracted, where required, for the assessment, monitoring, and management of risks associated with legionella bacteria.

Further Guidance

Further advice and guidance can be found in the following places:

- HSE
<https://www.hse.gov.uk/>
- HSE – Legionnaires’ Disease. The Control of legionella Bacteria in Water Systems (Approved Code of Practice L8)
<https://www.hse.gov.uk/pubns/priced/l8.pdf>
- HSE – Legionnaires’ Disease: A Brief Guide for Duty-Holders
<https://www.hse.gov.uk/pubns/indg458.pdf>
- HSE – legionella and Legionnaires’ Disease
<https://www.hse.gov.uk/legionnaires/index.htm>
- LCA – legionella Control Association
<https://www.legionellacontrol.org.uk/>